

Sealed

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United States Courts
Southern District of Texas
FILED

December 07, 2022

Nathan Ochsner, Clerk of Court

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS

IN THE MATTER OF THE UNITED
STATES OF AMERICA

VS

EDWARD CONSTANINESCU,
PERRY “PJ” MATLOCK,
JOHN RYBARCZYK,
GARY DEEL,
STEFAN HRVATIN,
TOM COOPERMAN,
MITCHELL HENNESSEY,
and,
DANIEL KNIGHT,

Defendants.

Case No. **4:22cr612**

Filed Under Seal

MOTION TO SEAL INDICTMENT

COMES NOW the United States of America, by and through Jennifer Lowery, United States Attorney, and Thomas H. Carter, Assistant United States Attorney, for the Southern District of Texas, and moves this Honorable Court to seal the indictment and attachments in this matter in support thereof, and would state the following:

The indictment and the supporting documents contain information related to and the identity of the subjects of a criminal investigation, and information regarding an investigation into interstate commodities and securities fraud. This evidence can easily be relocated, destroyed, or altered. The criminal acts being investigated and methods which are being employed to investigate the criminal activity are sensitive information. Public exposure of this information could compromise the investigation, the preservation of evidence, and arrest of the defendants.

WHEREFORE, the Government requests that the Indictment, supporting documents and this document, be filed under seal for ninety (90) days, except for a copy to the Affiant and investigating agency for their investigative needs and a copy to execute the warrants.

Respectfully submitted,

JENNIFER LOWERY
United States Attorney

THOMAS H. CARTER

Thomas H. Carter
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